

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

UNITED STATES OF AMERICA	)	CAUSE NO.	2 . 1 5 C R	1 9
	)			
v.	)	18 U.S.C. § 922(a)(6),		
	)	§922(g)(1)		
RICHARD ROWE &	)	§2		
MARCUS JONES	)			

**-FILED-**

**INDICTMENT**

FEB 18 2015

THE GRAND JURY CHARGES:

At \_\_\_\_\_ M  
ROBERT N. TRGOVICH, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

**COUNT 1**

On or around October 1, 2014 within the Northern District of Indiana,

**RICHARD ROWE  
&  
MARCUS JONES**

defendants herein aided and abetted by each other, in connection with the acquisition of firearms, to wit one (1) Sturm Ruger .45 caliber handgun with serial number 665-09181 and one (1) Springfield Armory, 9 millimeter handgun with serial number XD959335 by MARCUS JONES from Westforth Sports Inc., a licensed firearms dealer, did cause MARCUS JONES to knowingly make a false and fictitious written statement to an employee of said licensed dealer, which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by MARCUS JONES, in that MARCUS JONES represented that he was the actual buyer of the firearms, when in fact, as MARCUS JONES and RICHARD ROWE then well knew, the firearms were purchased on behalf of another person.

All in violation of Title 18, United States Code Section 922(a)(6) and (2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 2**

On or around October 15, 2014 within the Northern District of Indiana,

**RICHARD ROWE  
&  
MARCUS JONES**

defendants herein aided and abetted by each other, in connection with the acquisition of firearms, to wit one (1) Smith & Wesson 22LR Rifle with serial number HCF5063, one (1) Glock 40 caliber pistol with serial number RBS959 and one (1) FT Tangfoglio/EAA 10mm pistol with serial number MT05337 by MARCUS JONES from Westforth Sports Inc., a licensed firearms dealer, did cause MARCUS JONES to knowingly make a false and fictitious written statement to an employee of said licensed dealer, which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by MARCUS JONES, in that MARCUS JONES represented that he was the actual buyer of the firearms, when in fact, as MARCUS JONES and RICHARD ROWE then well knew, the firearms were purchased on behalf of another person.

All in violation of Title 18, United States Code Section 922(a)(6) and (2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 3**

On or around October 28, 2014 within the Northern District of Indiana,

**RICHARD ROWE  
&  
MARCUS JONES**

defendants herein aided and abetted by each other, in connection with the acquisition of firearms, to wit one (1) H&K Inc, model, USP Compact, .45 caliber pistol, with serial# 29-018636, one (1) Zastava/CAI, model PAP M85NP, 5.56 caliber pistol with serial # M85-NP000298 and one (1) Walther Arms, model PK380 caliber pistol with serial #WB026930 by MARCUS JONES from Westforth Sports Inc., a licensed firearms dealer, did cause MARCUS JONES to knowingly make a false and fictitious written statement to an employee of said licensed dealer, which statement was likely to deceive said employee as to a fact material to the lawfulness of such acquisition of the said firearms by MARCUS JONES, in that MARCUS JONES represented that he was the actual buyer of the firearms, when in fact, as MARCUS JONES and RICHARD ROWE then well knew, the firearms were purchased on behalf of another person.

All in violation of Title 18, United States Code Section 922(a)(6) and (2).

THE GRAND JURY FURTHER CHARGES:

**COUNT 4**

On or around October 28, 2014 within the Northern District of Indiana,

**RICHARD ROWE**

defendant herein, having previously been convicted of Distribution of Narcotics in case #69DU-CR-08-4847 in the St. Louis County District Court, said crime being punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm and ammunition, to wit:

- one (1) High Point Arms, model CF380, .380 caliber pistol with serial # P8058292

All in violation of Title 18, United States Code, Section 922(g)(1).

**A TRUE BILL**

S/FOREPERSON\_\_\_\_\_

FOREPERSON

DAVID CAPP  
United States Attorney

By: S/THOMAS M. MCGRATH\_\_\_\_\_  
THOMAS M. MCGRATH  
Assistant United States Attorney